

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VARTA MICROBATTERY GMBH,

v.

GUANGDONG MIC-POWER NEW
ENERGY CO., LTD.

VARTA MICROBATTERY GMBH,

v.

PEAG, LLC d/b/a JLAB AUDIO

CASE NO. 2:21-cv-00036-JRG

**LEAD CASE
JURY TRIAL DEMANDED**

CASE NO. 2:21-cv-00038-JRG

**MEMBER CASE
JURY TRIAL DEMANDED**

Joint Motion to Stay All Deadlines and Notice of Settlement

Pursuant to the Court's Standing Order, as well as the Court's request on June 2, 2022 for a joint notice regarding case status, Plaintiff VARTA Microbattery GmbH and Defendants Guangdong Mic-Power New Energy Co., Ltd. and PEAG, LLC d/b/a JLab Audio (collectively, the "Parties") respectfully file this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties hereby notify the Court that they have reached a settlement in principle (which was reached approximately 30 minutes prior to this filing) resolving the matters in controversy between them in the above-styled actions. The Parties request that the Court stay all deadlines and settings in said actions for thirty (30) days so that appropriate dismissal papers may be submitted.

Dated: June 2, 2022

/s/ Andrew W. Stinson

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Certificate of Service

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via CM/ECF on June 2, 2022.

/s/ Andrew W. Stinson

Andrew W. Stinson

Certificate of Conference

I hereby certify that Counsel for Plaintiff and Counsel for Defendants Guangdong Mic-Power New Energy Co., Ltd. and PEAG, LLC d/b/a JLab Audio have complied with the meet and confer requirement in Local Rule CV-7(h) regarding this Motion. The Parties are in agreement as to the relief sought herein.

/s/ Andrew W. Stinson

Andrew W. Stinson